

REMARKS

Claims 1-53 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 112

Claims 1 and 42 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter. Applicant has amended these claims to address these concerns. Applicant believes that all pending claims particularly point out and distinctly claim the subject matter of the present invention. Therefore, reconsideration and withdrawal of this rejection is respectfully requested.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 1-4, 6-48, and 52-53 stand rejected under 35 U.S.C. §103 as being unpatenable over Blackett et al. (U.S. Pat. No. 6,944,555) in view of Mathur (U.S. Patent No. 7,124,397). These rejections are respectfully traversed.

Blackett relates generally to a power management architecture for an electrical power distribution system. The Blackett system is designed to work with a separate proxy server. See Blackett's discussion of the proxy server at col. 23, lines 46-55. Thus, as conceded by the examiner, Blackett does not teach or suggest inclusion of the proxy within the node element itself. The Examiner relies upon Mathur to teach this aspect of applicant's claimed invention.

In contrast, the node element in applicant's system includes a proxy having a universal format interface. Of note, claim 1 recites "a proxy having a universal format interface that makes available a local control interface of a first local load device available and that allows remote control of the first local load device, through the universal format interface, using a universal format different from a local control protocol of the first load device" in combination with other elements of the claim. In this way, applicants' system will support peer-to-peer operation where the self-contained proxy handles the universal formatting requirements. In Mathur, a plurality of communication interfaces are shown in the communication interface layer 70. Contrary to the Examiner's assertion, Mathur fails to teach or suggest that any of these interfaces enable remote control of the load device. It is further noted that the control is achieved using a universal format that is different from the local control protocol of the load device. Therefore, it is respectfully submitted that Claim 1, along with claims depending therefrom, defines patentable subject matter over the combination of references. Other independent claims recite similar subject matter and thus overcome the current rejections for the same reasons as discussed in relation to claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of this rejection.

CONCLUSION

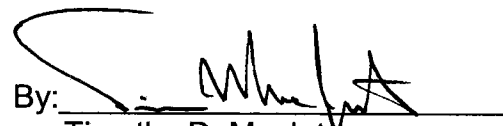
It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office

Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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